

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON

MDL No. 2738 (FLW) (LHG)

PRACTICES AND PRODUCTS

LIABILITY LITIGATION

**DECLARATION OF JOEL SCHNEIDER
PURSUANT TO FED. R. CIV. P. 53**

I, Joel Schneider, hereby declare and state as follow:

1. I am a retired U.S. Magistrate Judge (“U.S.M.J.”) and attorney of the State of New Jersey. I served as a U.S.M.J. from October 31, 2006 to January 15, 2021. I was in private practice in PA and NJ from 1980 until my appointment as a U.S.M.J. I was admitted to the Pennsylvania Bar in 1980 and the New Jersey State Bar in 1986.

2. Since February 1, 2021, I have been employed as Of Counsel with Montgomery, McCracken, Walker & Rhoads, LLP (“MMWR”), out of its Cherry Hill, NJ office.

3. I submit this Declaration in support of my appointment as Special Master pursuant to Fed. R. Civ. P. 53.

4. In March 2021, I was advised that I was being considered to be a Special Master in the above-captioned matter. I reviewed the pleadings in the matter and checked with MMWR’s conflict system to determine whether there is any conflict that would preclude me from serving as Special Master.

5. The conflict check revealed that there is no conflict that would preclude me from serving as Special Master.

6. I never represented any party in this matter while I was in private practice. I do not believe I handled any case involving any of the parties while I was a U.S.M.J. I have never been involved in any matter involving talc.

7. I am confident that neither I nor the MMWR firm are involved in any matter with a party to this matter, or represent any party in this matter, or have any relationship with any counsel for a party in this matter, which would preclude me from accepting the appointment of the Court pursuant to Fed.R.Civ.P. 53.

8. In the interest of full disclosure I learned that in the past MMWR represented Johnson & Johnson ("J&J"). The engagements pre-date me joining the firm. I have been told those matters are completely unrelated to talc. MMWR does not currently represent J&J. I will assure that anyone who did work on any Johnson & Johnson matter in the past will be screened and will not do any work on this matter.

9. Pursuant to Fed.R.Civ.P. 53, I hereby declare there is no ground for my disqualification under 28 U.S.C. Sec. 455.

I declare under penalty of perjury that the foregoing is true and correct.

By: _____
JOEL SCHNEIDER

Executed on: March 10, 2021